

Exhibit 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LTL MANAGEMENT LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDOX

Defendants.

DOCKET NO.: 3:23-CV-03649-MAS-
RLS

CIVIL ACTION

DECLARATION OF DR. RICHARD L. KRADIN, MD

Dr. Richard L. Kradin, MD hereby declares under penalty of perjury as follows:

1. I am over eighteen (18) years of age and have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.

2. I am an Honorary Pathologist and Honorary Associate Physician at Massachusetts General Hospital and am board-certified in Internal Medicine, Anatomic Pathology and Pulmonary Medicine. I took honorary status following my retirement from the practice of medicine in 2019.

3. In addition, I am a Consulting Pathologist and Pulmonologist at Hadassah Hospital Jerusalem, IL, an Associate Professor Emeritus of Medicine and Pathology at Harvard Medical School, and a Professor at American Scholars. I took Emeritus status following my retirement from Harvard Medical School in 2019.

4. During my retirement, I have continued to serve as an expert witness in asbestos litigation and other medical-legal cases related to pulmonary disease. My principal place of business is New Hampshire.

5. I currently reside in New Hampshire and have resided there since 2019. I also spend a portion of the year in Florida.

6. I am licensed to practice medicine in the states of Massachusetts and Florida. I am not licensed to practice medicine outside of these two states.

7. I have never resided in New Jersey, and have never practiced medicine in New Jersey.

8. I do not own or lease any real property in New Jersey, and do not hold any bank accounts in New Jersey.

9. I have never to my knowledge served as an expert witness in any case filed in any state or federal court in New Jersey.

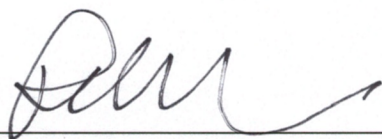
10. I co-authored a peer-reviewed article entitled "Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients," which was subsequently published in March 2020 in the American Journal of Industrial Medicine (the "Article").

11. I researched and drafted the Article while residing in Massachusetts, New Hampshire, and Florida.

12. I briefly served as a contributing editor to the Journal while I was employed at Massachusetts General Hospital in 2017-2019, prior to submitting the Article to the Journal for publication. In that capacity, I reviewed articles submitted to the Journal that included references to pathology, and can only recall reviewing two articles during that time frame. To the best of my knowledge and recollection, I have not had any contact with the Journal in connection with this role since 2019, when I retired from Massachusetts General Hospital. I have not reviewed any articles since that 2019, and was surprised to learn from the Complaint filed in this case that I am still listed as a "contributing editor" to the Journal. *See* ECF No. 1, Compl. ¶ 38 & n.3.

13. When I researched and drafted the Article and submitted it to the Journal for publication, I did so with the hopes it would be published nationally, and not in any particular state.

Executed on September 12, 2023.


A handwritten signature in dark ink, appearing to read 'Dr. Kradin', is written over a horizontal line.

Dr. Richard L. Kradin, M.D.